

Expert Report of Georg C. LaBonte, Esq.

United States of America

vs.

Samy M. Hamzeh

I. Introduction

My name is Georg C. LaBonte. I am owner and operator of Fireline Shooting & Training Centers, currently with two indoor shooting range locations, Rice Lake, Wisconsin and Appleton, Wisconsin. We have been in operation since 2014. My primary duties at Fireline Shooting & Training Center revolve around setting goals, marketing, financials, information technology as well as instruction. I am an NRA Certified Firearm Instructor in Pistol, Rifle and Shotgun, and am an NRA Chief Range Safety Officer, I also educate and help customers in establishing firearm trusts, purchasing and navigating the laws that govern ownership of Title 2 firearms and registration under the National Firearms Act (NFA).¹ Fireline Shooting and Training Centers have a Type 01 Federal Firearms License (FFL)² as well as a Class 3 Special Occupation Tax (SOT)³, capable of owning and selling Title 2 firearms. Fireline Shooting & Training Centers sell suppressors, and has available to rent both machine guns and suppressors for use in its facilities. As an individual, I personally own a suppressor having completed the formalities of NFA tax registration. Prior to opening and operating Fireline Shooting & Training Centers I received a Juris Doctor from Suffolk Law School in Boston, Massachusetts and later a Masters of Law in Estate Planning and Elder Law from Western New England School of Law. I practiced law

¹ Title 2 firearms, refer to those types of firearms regulated by the Gun Control Act of 1968. Specifically, Machine Guns, Destructive Devices and Certain Other Firearms (not regulated by Title 1).

² A Federal Firearm License Type 01, is issued to a firearm dealer wishing to sell Title 1 firearms.

³ A Class 3 Special Operations Tax is a \$500 annual registration to qualify a dealer to sell Title 2 firearms.

for several years in Massachusetts before passing the bar in Wisconsin and returning here to raise my family.⁴

The following represents my Rule 26 Report in the matter of United States of America v. Samy Hamzeh. It is based on review of materials submitted to me by Federal Defender Services of Wisconsin, Inc., my involvement and experience in the firearm industry, my education and experience in interpreting and understanding the legal complexities of NFA firearm ownership.

II. Purpose and Summary

I have been retained by Joseph A. Bugni and Craig W. Albee, who are counsel for the defendant in this case, to provide expert testimony. I received \$150 per hour for my work. I've spent Eleven and 7/10 hours (11.7) hours consulting, researching and preparing this report, for a total of One Thousand Seven Hundred and Fifty-Five (\$1,755.00) Dollars. Specifically, I was asked to provide an overview of NFA rentals, and describe the processes, protections and legal reasoning used in the indoor shooting range industry surrounding the rental and use by customers of NFA firearms owned by dealers. I was also asked to provide pricing information for the NFA firearms in question, and a determination of how many tax registrations would be required on the NFA firearms in question and how the average buyer would know how many registrations were required.

III. Documents Provided by Defendant Counsel

1. Fifth Pretrial Motion: Motion to Dismiss Count Two.
2. Federal Bureau of Investigation, Arrest Report and Evidence Recovery Log.
3. Firearm Technology Criminal Branch Report of Technical Examination.
4. Photographs of Exhibits #1, #2 and #3.
5. Request for Authorization for Release of Documents of the National Firearms Registration and Transfer Record (NFRTR) Database and National Firearms Act.

⁴ Current CV attached as Exhibit 1.

IV. Professional Opinions and Basis for these Opinions

Renting of Machine Guns

In almost every state in America it is possible for individuals to experience shooting a machine gun. Even in states like Wisconsin, where the sale of machine guns by licensed dealers is limited to military forces and peace officers, machine guns are still readily available at select ranges⁵ for civilians to rent and experience what it's like to shoot a machine gun. In fact, in certain states it is even possible for individuals to own machine guns outright.

A quick look at the history of machine guns and laws is warranted. Machine guns have been around since the Maxim, created in 1884. It was not until 1934 when the National Firearms Act was passed that it became a requirement to pay a tax of \$200 to register a machine gun, along with application, photographs, passport photos, law enforcement approval and a background check.⁶ In 1968 the Gun Control Act was established that barred the sale of imported machine guns to civilians, however, previously imported machine guns were provided amnesty. On May 19, 1986 the Firearm Owners Protection Act was passed which banned all new machine gun creation or sales except for gun manufacturers, dealers, military and law enforcement.

With this in mind, we can state with certainty, if a civilian owns a machine gun, it was made prior to May 19, 1986. Dealers, may own guns dated prior to 1986, however, it is more likely that a dealer has a brand new machine gun to rent, or at the very least one made sometime after May 19, 1986. Newer machine guns are significantly less expensive to own, not only because their sale is heavily regulated and restricted, but also because there is limited market for resale. In order for Fireline Shooting & Training Center to obtain machine guns for rental purposes, it needed to solicit local police departments for an

⁵ See Fireline Shooting & Training Centers, Rice Lake, WI and Appleton, WI; Bill's Gun Shop & Range, Hudson, WI, and; Fletcher Arms, Waukesha, WI.

⁶ The registration fee of \$200 in 1934, is the equivalent of about \$3,500 today, which effectively barred new sales to average citizens, and turned the machine gun into a luxury item.

interest in obtaining machine guns for their law enforcement agency. After obtaining approval from local law enforcement to purchase a sales sample machine gun for demonstration purposes, the machine gun was now in its possession, Fireline Shooting & Training as the registered owner is capable of using the machine gun for any legal means.

One of the industry accepted practices of using a registered sales sample machine gun is to rent it to civilians as a way to experience shooting full-automatic, or through bachelor and bachelorette parties, corporate outings, or other similar events. Because the high cost of machine gun ownership, this is perhaps the only opportunity available to civilians as a way to experience these firearms. Machine guns may also be made available to eligible prospective buyers, or for law enforcement training purposes.

One big hurdle under Wisconsin Statute § 941.26(1g)(a) is that “[n]o person may sell, possess, use or transport any machine gun or other full automatic firearm.” This law, and similar laws, exists to prohibit civilian ownership of machine guns, Fireline Shooting & Training as a Type 01 Class 3 dealer of Title 2 firearms, is exempted. The two glaring words in this Statute are “possess” and “use,” begging the question, why anyone would rent a machine gun in Wisconsin for fear of being arrested for possessing or using it. Unfortunately, there is no black and white answer, as no one has ever been arrested for renting a machine gun in Wisconsin, or in any other state to my knowledge, which some have theorized suggests an answer in and of itself. The other highly adopted reasoning, is that Class 3 dealers are allowed some leniency as authorized dealers in Title 2 weapons to have sales samples for demonstration purposes to prospective buyers. Although it is not legal for a civilian to own a machine gun in Wisconsin, it is legal for ownership in the United States, and any knowledgeable buyer in the market for a machine gun might want to try shooting one before embarking on the expensive process of obtaining one. It is also possible for dealers to sell machine guns to an out of state individual, that individual would likely come test fire it before going through the lengthy and costly process of purchasing and transferring it to his or her home state. It is not untypical for a Wisconsin resident to own a machine gun that is securely stored in another state.

I have personally rented machine guns to customers, as well as being on the other side, I have rented machine guns in both Minnesota and New Hampshire. In all cases, the person renting the NFA firearm, the employee of the dealer, maintained proximity to the machine gun, although physical possession of the firearm was clearly with the customer. This type of physical possession has never lead to any arrests, fines, prosecution, or revocation of a Federal Firearms License. It has been generally accepted in the shooting industry that by the actions of a dealer: maintaining close proximity to the machine gun, restricting access to the machine gun, maintaining control over the ammunition, and other similar steps of exerting control over that firearm, it is enough to satisfy that actual possession and control of the NFA firearm is maintained by the shooting facility and that no transferrable action has occurred.

Renting of Suppressors

Suppressors or silencers, don't enjoy the robust legislation of machine guns, but do require the same type of tax registration under the 1934 NFA. The use of suppressors has been largely left to the states to mandate on their own, with the vast majority (42 states) allowing their use. Nearly all states that allow suppressors, including Wisconsin, promote their use in hunting, to reduce noise pollution and hearing damage. Therefore, as suppressors are a regularly sold product in the majority of the states, rental of suppressors is even more widespread than any other NFA firearm.

Although some customers already know the benefits of using a suppressor, many have never experienced them other than what they see on TV.⁷ In order to promote sales, educate consumers, and allow them to experience the actual difference, it is necessary to let them shoot through a suppressor. Gun stores with shooting ranges, and even manufacturers of suppressors, allow demonstrations or let consumers rent their

⁷ Note: What is shown on TV and movies is a large exaggeration. The average noise of a firearm is 140-160 dB. A suppressor reduces sound on average by 25-30 dB. Even by reducing the sound of a firearm to between 110-145 dB, which is still fairly loud, it is recommended you still use additional hearing protection. In comparison, a chainsaw is approximately 100 dB and a loud siren is approximately 120 dB.

suppressors for use on the premises; there is typically less worry and oversight in their handling. Top suppressor manufacturers, such as Sig Sauer and SilencerCo, provide manufacturer owned suppressors for use on dealer ranges during special promotional events with their products. Typically, manufacturers send one or two representatives from the company and bring their own firearms equipped with suppressors. The manufacturer representatives might setup a table or booth and display retail product to sell, explain and engage customers regarding their brand. The dealer would stage the range with different lanes containing different suppressors, and then the dealer's employees might escort customers onto the range to test fire some rounds through the suppressor of their choice. The manufacturer, as owner of the suppressors, lets dealer employees be the safeguard of their NFA items, in this particular instance. This is standard practice at nearly all ranges across the country when hosting a suppressor event as the representatives are the most knowledgeable individuals about their product line, and have the greatest value talking to the customers. This is nearly impossible to do comfortably on the range, because everyone is required to wear hearing protection, other customers are shooting, and it becomes quite difficult to hold a conversation on the range.

Similarly, when dealers rent suppressors from their own inventory to customers, it is typical that the dealer will allow them to take the suppressor on to the range without any supervision. The only thing Fireline Shooting & Training requires is that they provide proper photo identification (driver's license), that we hold in a lockbox until they exit the range and return the suppressor.

It has long been understood by manufacturers and dealers, that we are allowed some latitude to promote, market, sell and demonstrate products to customers in an attempt to secure a sale. The NFA goes so far as to allow employees of dealers and manufacturers to transport NFA items in interstate delivery for business purposes.⁸ The general consensus has always been and is oft repeated, dealers and manufacturers are

⁸ See National Firearms Act Handbook, Chapter 9.5.2, ATF E-Publication 5320.8, Revised April 2009.

not transferring ownership or control, not even temporarily transferring it, they are merely allowing a sales demonstration, and are using it for business purposes, even though physical possession and usage rests with the customer.

Heckler & Koch, MP5SD, 9x19mm

In review of the photographs this particular MP5SD is more aptly an MP5SD3, which was manufactured with a retractable buttstock, the "SEF" trigger group and the integrated suppressor. The MP5SD began manufacturer in 1974, and this particular firearm was manufactured in 1979.⁹ Under current interpretation of the NFA, because this firearm has a standard threaded removable suppressor, it would require two separate NFA tax registrations. Though despite this simple conclusion it still creates much confusion among the general public, and even some law enforcement. From its German origins, identification as an integrally suppressed machine gun, to the history and understanding of its operation it has civilians and law enforcement confused as to the separation of its respective parts.

The first confusion among consumers who are not familiar with machine guns, or Heckler & Koch, is the selector switch. This particular firearm was manufactured with an "SEF" selector switch, it is a three position lever that points to one of the three letters, with no explanation of their meaning on the firearm itself. The white "S" stands for "Sicher" which is the German word for "Safe," and the red "E" stands for "Einzelfeuer" which translates to "Single Fire" or as we call it "Semi-Automatic," and lastly the red "F" stands for "Feuerstoß" which translates to "Burst of Fire" or as we call "Automatic Fire". H&K, however, also created a simplified lettering system for other rifles, with a two position selector lever of "SF" which was an English selector, simply describing "Safe" and "Fire" and was only available in semi-automatic. So it is feasible for someone to own two H&K

⁹ This can be determined from my Exhibit 2, "Exhibit 1, Picture 3," in which the serial number denotes the alpha-code HK, H&K utilizes an alpha-code dating system in which the letter A = 0, B =1, and so forth. Thus we can tell from this HK code, where H = 7 and K = 9, creating the manufacture date of 1979.

firearms, one with an English "F" for semi-automatic and one with the German "F" for fully automatic. This has led to some confusion as to how to properly identify whether or not a firearm is a machine gun based on ambiguity between the "SEF" and "SF" selector switches.

As the MP5SD gained popularity among armed forces in the United States the lettered markings were eliminated and replaced by icons of bullets, with seven red bullets denoting fully automatic, three red bullets as 3-round burst, one red bullet as semi-automatic, and a white bullet with an "X" through it denoting safe. H&K has since simplified all of its long guns to use the graphical red or white bullet icons, thus eliminating the confusion caused on earlier models.

The second area of confusion stems from the fact that this particular firearm was originally manufactured and marketed as an integrally suppressed machine gun. The term "integrally suppressed" is typically used to describe firearms in which the suppressor is integral to the function and operation of the firearm, but has become synonymous with permanently suppressed.¹⁰

In today's market, one can find integrally suppressed firearms in nearly every gun store and even online. Take the Maxim 50, an integrally suppressed muzzleloader developed by SilencerCo and released in Fall 2017. This unique gun requires no tax stamp, and is not even considered a firearm under the Gun Control Act, because it is designed as an antique muzzleloader which falls outside regulation. The Maxim 50 is thus not a firearm, and the suppressor which is permanently attached to it, can only suppress the Maxim 50, thus it is not suppressing a firearm and is not cover by the NFA. This makes the Maxim 50 salable without any background checks, and it can be ordered online and shipped to anyone without restriction.

Another popular and unique situation involves Short-Barreled Rifles (SBRs) with integral suppressors which only require a single tax stamp. Under the NFA, an SBR is

¹⁰ Merriam-Webster defines integral as "essential to completeness."

classified as any shouldered rifle with a barrel less than sixteen (16") inches or an overall length less than twenty-six (26") inches. Purchase of any firearm fitting this classification requires a tax registration. Combine that with a suppressor that threads on to the SBR, you create a firearm that requires two tax registrations. Individuals looking to eliminate one of those tax registrations, can purchase an SBR that has an integral suppressor that is permanently attached to the firearm. The suppressor is now permanently connected to the barrel, and if the new combined barrel length and overall length of the firearm is greater than the requirements above, the firearm is no longer an SBR, the only tax registration required is for the suppressor.

When considering the tax registrations required for this particular MP5SD3, we have to analyze each part individually. We start by analyzing the firearm itself. Is the MP5SD3 a firearm as defined by law? Yes. The MP5SD3 should be classified as a Title 2 firearm for two reasons, firstly it is a shouldered rifle with a barrel less than sixteen (16") inches, thus making it an SBR, secondly, it is capable of being fired without manual operation of the trigger, thus making it a machine gun. Although it is both a machine gun and an SBR the MP5SD3 is a single tax registration.¹¹

The second step in this analysis is analyzing the suppressor, is it a device used to suppress the sound of a firearm? Yes. Is the suppressor integral to the operation of the firearm? Yes, however, this particular suppressor is not exclusively integral to the operation of this particular MP5SD3, so the suppressor does require its own tax registration. This slight distinction creates large confusion both in law enforcement and in the civilian marketplace.

In looking at modern integrally suppressed firearms, that require either no tax stamp, or a single tax stamp, one could assume the MP5SD3 also falls into one of those categories, either the firearm as a whole is a firearm under the definition of the NFA,

¹¹ The status of a firearm between SBR "or" machine gun has always been a separate distinction; it cannot be both. Because a machine gun is more heavily regulated, the machine gun status always supersedes the SBR status. It is not possible to have a short-barreled machine gun.

requiring a single tax stamp, or the firearm is not defined under the NFA, and does not require a tax stamp. Obviously, in the MP5SD's case, it is a machine gun under the NFA and thus requires a tax registration. The only question remaining is whether or not the integral suppressor requires its own tax registration.

When you consider the MP5SD3 in its entirety, it makes sense why it was deemed an integrally suppressed firearm, namely, the gun just doesn't work without it. In reviewing the reports, it was stated that "Exhibit 1 was designed and manufactured to operate with the Exhibit 3 silencer attached."¹² The necessity of this suppressor to the firearm was further realized in the test firing performed on this firearm as well. Stating that with "the ported barrel, there was not enough gas pressure for the firearm to perform the cycle operation properly and eject cartridges. The remainder of this test was completed with Exhibit 3 attached to allow proper functioning of the firearm."¹³ Thus without the suppressor attached to an MP5SD3 it will not shoot more than one bullet at a time, and must be manually cycled, or manually reloaded to fire again. The MP5SD was to be a Sound Dampener (hence the SD suffix) and its features turn supersonic ammunition into subsonic ammunition before it leaves the firearm, thus eliminating that supersonic "crack" that is so distinctly a gunshot.

The confusion around the tax registration status of this firearm can be evidenced further by the description provided by the FBI Firearms Instructor who was familiar with the weapon, stating "[t]he suppressor is not a separate item for the weapon" and that "the suppressor is manufactured as a part of that serial number weapon, not a separate item."¹⁴

Although it is clear to me, as a dealer in NFA firearms, that a machine gun (even one that will not operate automatically without a suppressor or modified barrel) is a separate NFA tax registration, and the integral but removable suppressor (which could be used on any compatible threaded barrel) is also a separate NFA tax registration; one need

¹² Firearm Technology Criminal Branch Report of Technical Examination, Page 2.

¹³ Firearm Technology Criminal Branch Report of Technical Examination, Page 3.

¹⁴ Federal Bureau of Investigation Official Evidence Record, Page 2.

only look to the numerous questions on the internet from interested buyers and sellers, or even to law enforcement agencies, that the MP5SD is considered by many to be a single serialized item and not two separate items. It is reasonable for an individual to wrongfully believe this MP5SD3 only requires a single tax registration.

Heckler & Koch, MP5/10, 10mm

This firearm is a rare breed, and is reserved almost exclusively for the armed forces and law enforcement. Demand for a higher caliber platform of the popular MP5, H&K created the MP5/10 in 1992 and stopped production in 2000. This particular MP5/10 was manufactured with the date code KH (1997)¹⁵ making this firearm a post-86 sales sample, it is unable to be transferred to the civilian marketplace. This firearm has no suppression and requires only a single tax registration.

Pricing

Heckler & Koch, MP5SD, 9x19mm

Because of the limited availability of machine guns that can be sold in the civilian marketplace, all pre-86 machine gun prices fluctuate greatly and continue to rise. A typical MP5SD can range from \$9,000 - \$44,000. The steep range in pricing is typically determined by how the MP5SD was manufactured, it's condition, whether any parts have been upgraded, refurbished or replaced by non-original components, and what internal components are used in its operation.

I would value this particular MP5SD3 at roughly \$15,000 - \$20,000 on the collector's market. I arrived at this value because this model is not as desirable as later pre-86 models, such as the MP5SD4, MP5SD5, and MP5SD6, which are also available for civilian collectors.

¹⁵ See my Exhibit 2 "Exhibit 2, Picture 13," and reference footnote 9.

The key pricing points I factored in are: (i) that this is a civilian transferrable machine gun produced before May 19, 1986; (ii) that it contains its original serialized suppressor; (iii) the exterior images show a fairly well maintained firearm for a nearly 40-year-old gun; (iv) as demonstrated this firearm performs in all firing modes, and (v) it is a rare vintage with none currently on the market. It is not as valuable as some of the listed examples for reasons such as, many of the more expensive versions have been professionally restored and refurbished to like new condition, have been upgraded with other components.¹⁶

An individual in the market for a fully-automatic transferrable firearm would likely know the extreme cost of these firearms. It is exceedingly rare to find even small pistol platform machine guns, such as the UZI or MAC 10, for less than \$8,000.

Heckler & Koch, MP5/10, 10mm

This particular machine gun is much more difficult to price, as it is not a commodity for the general public. Also because this firearm is not manufactured anymore, there is no reason for a dealer to purchase one as a sales sample for marketing to law enforcement or military. Thus, this particular firearm has a value substantially similar to semi-automatic counterpart the MP5/40, and I would value this gun at approximately \$3,000 - \$4,000.

Georg C. LaBonte, Esq.

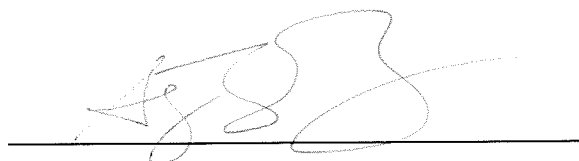
¹⁶ See following listings (also attached as Exhibits 3), MP5SD, 1986, \$43,995.00, <https://dealernfa.com/shop/mp5sd-a3-sh-arms-sear-suppressor-4-position-pack-dyer-excellent-1176-1176s-8671/>; MP5SD, \$42,000.00, <https://machineguncentral.com/ViewDetails.aspx?p=307--d11ac4d7-ddb2-4c34-bab0-302bd9929fce> (sold); MP5SD, 1983, \$9,000.00 <https://machineguncentral.com/ViewDetails.aspx?p=307--d6435a86-c2bd-4530-8c20-0aae3f79cf94>; MP5SD, 1983, \$39,000.00, <https://machineguncentral.com/ViewDetails.aspx?p=331--c272a5a9-b375-4911-92a0-c066d10ac6f5>; MP5SD, \$31,999.00, <http://www.armslist.com/posts/1698757/florida-nfa-firearms-for-sale--hk-mp5sd--master-chief--sub-gun-tac-pac-9mm->; MP5SD, \$40,000.00, http://www.subguns.com/classifieds/index.cgi?db=nfafirearms&website=&language=&session_key=&search_and_display_db_button=on&results_format=long&db_id=29945&query=retrieval; MP5SD, 1984, \$16,500.00, <https://www.legacy-collectibles.com/h-k-mp5-sd-full-auto.html> (sold).

The key pricing points I factored in are: (i) that this is a civilian transferrable machine gun produced before May 19, 1986; (ii) that it contains its original serialized suppressor; (iii) the exterior images show a fairly well maintained firearm for a nearly 40-year-old gun; (iv) as demonstrated this firearm performs in all firing modes, and (v) it is a rare vintage with none currently on the market. It is not as valuable as some of the listed examples for reasons such as, many of the more expensive versions have been professionally restored and refurbished to like new condition, have been upgraded with other components.¹⁶

An individual in the market for a fully-automatic transferrable firearm would likely know the extreme cost of these firearms. It is exceedingly rare to find even small pistol platform machine guns, such as the UZI or MAC 10, for less than \$8,000.

Heckler & Koch, MP5/10, 10mm

This particular machine gun is much more difficult to price, as it is not a commodity for the general public. Also because this firearm is not manufactured anymore, there is no reason for a dealer to purchase one as a sales sample for marketing to law enforcement or military. Thus, this particular firearm has a value substantially similar to semi-automatic counterpart the MP5/40, and I would value this gun at approximately \$3,000 - \$4,000.



Georg C. LaBonte, Esq.

¹⁶ See following listings (also attached as Exhibits 3), MP5SD, 1986, \$43,995.00, <https://dealernfa.com/shop/mp5sd-a3-sh-arms-sear-suppressor-4-position-pack-dyer-excellent-1176-1176s-8671/>; MP5SD, \$42,000.00, <https://machineguncentral.com/ViewDetails.aspx?p=307--d11ac4d7-ddb2-4c34-bab0-302bd9929fce> (sold); MP5SD, 1983, \$9,000.00 <https://machineguncentral.com/ViewDetails.aspx?p=307--d6435a86-c2bd-4530-8c20-0aae3f79cf94>; MP5SD, 1983, \$39,000.00, <https://machineguncentral.com/ViewDetails.aspx?p=331--c272a5a9-b375-4911-92a0-c066d10ac6f5>; MP5SD, \$31,999.00, <http://www.armslist.com/posts/1698757/florida-nfa-firearms-for-sale--hk-mp5sd--master-chief--sub-gun-tac-pac-9mm->; MP5SD, \$40,000.00, http://www.subguns.com/classifieds/index.cgi?db=nfafirearms&website=&language=&session_key=&search_and_display_db_button=on&results_format=long&db_id=29945&query=retrieval; MP5SD, 1984, \$16,500.00, <https://www.legacy-collectibles.com/h-k-mp5-sd-full-auto.html> (sold).

Exhibit 1

Georg C. LaBonte, Esq.

2700 Pioneer Ave
Rice Lake, WI 54868
(715) 434-4867
georg@firelinestc.com



Publications & Presentations

Gun Trust Workshop

Jan. 2015 – Present

Instruct and revise a two-hour presentation designed to educate the everyday consumer on the benefits, uses and legal protections afforded when utilizing a gun trust to own NFA firearms and other firearms.

Real Estate Safety Seminar

Apr. 20, 2017

Wrote and presented a safety session for real estate agents for dealing with firearms in homes they are being showing, as well as when and if they should legally use their self-defense firearm while showing a home in the state of Wisconsin.

MassHealth Update 2012

Oct. 26, 2012

Wrote and presented the session on Caregiver Contracts for the voluntary continuing legal education seminar on the challenges of navigating Massachusetts, MassHealth (Medicaid) program, present by Foxmoor Continuing Education.

Interests



Shooting



Technology



Skiing



Piloting

WORK HISTORY

- Nov. 2013 – Chief Financial Officer
Present *Fireline, Inc., Fireline Grand Chute, LLC, Fireline Brands, Inc.*
- Owner and CFO of Fireline, Inc., and related companies, which operates indoors shooting ranges, with firearm instruction, and retail sales, as a Class 3 Dealer. Provides guidance and expertise on NFA Gun Trusts for customers.
- Jun. 2013 – Vice President
Present *Big Bike Parts, Inc.*
- Managing both domestic and foreign manufacturing of aftermarket motorcycle accessories with a worldwide distribution network.
- Apr. 2012 – Associate Attorney
May 2013 *Law Office of William J. Brisk*
- Estate Planning for high net-worth clients, Guardianships, Probates, Medicaid Planning and related services.
- Sep. 2010 – Of-Counsel, Law Clerk
Oct. 2011 *Sillari & Glines*
- Estate Planning, Personal Injury, Real Estate and Family Law.

EDUCATION

- 2010 – 2012 Western New England University School of Law
LL.M., Estate Planning and Elder Law
- 2007 – 2010 Suffolk University Law School
Doctor of Law (J.D.)
- 2002 – 2006 University of Wisconsin-Milwaukee
Bachelor of Arts, Economics

RESEARCH EXPERIENCE

- Aug. 2009 – Tax Reform Research Assistant
Dec. 2009 *Conway, Meredith R., With or Without You: Debt and Equity and Continuity of Interest (May 30, 2010). Stanford Journal of Law, Business, and Finance, Vol. 15, p. 261, 2010; Suffolk University Law School Research Paper No. 10-67.*

Exhibit 2

308336 - Exhibit 1 - Picture 1, 2, 3: Exhibit 1



308336 - Exhibit 2 - Picture 11, 12, 13: Exhibit 2



Exhibit 3

For Sale: HK MP5SD "MASTER CHIEF" SUB-GUN TAC-PAC 9MM

Listed In: NFA Firearms [Save to Favorites](#)

[Flag](#) [Share:](#)

\$ 31,999



Avguns.com Custom Shop Proudly presents "MASTER CHIEF" NIB Condition, Zero Round Count. This is the Rolex of the Sub-Gun World. Brand New Hk MP5SD 9mm NATO Civilian Legal transferable Pre-1986 Sub-Machine Gun with Integral Suppressor. Boys and Girls.. It just does not get any better than this.. This Sub-Gun is Stellar. This is a registered receiver unit built on an Hk94 Platform by Flemming Firearms. Correct MP5SD Stamping with factory Hk parts. Push-Pin and Paddle Mag Release. Custom Integral Suppressor is removable and can be disassembled for serves. Suppressor is built by Gun Point. Rated @ about 34-36Db.

Unit is presented in outstanding Black Molly Finish. (3)-30 Round HK Factory New Mages. (500)-Rounds of Federal XML9N1 Sub-Gun Ammo 124Gr 1250 Fps! Condor Tactical Range Case. This is 2 Stamp Gun You are good to go!

This custom package is only available from Avguns.Com Custom Shop, and you will not find a package deal like this anywhere else on the internet! Bid with confidence as you will not be disappointed !!

!! We will Pay Top Dollar for Legal Machine and Sub-Machine Guns !!

Don't miss our way cool Full-Auto Fun vids on our YouTube Channel
Please feel free to contact us direct from 9-9 / 7 Days. 1-REDACTED
We are looking forward to hearing from you!

In this Custom "MASTER CHEF" MP5SD package you receive:

HKMP5SD 9mm NATO Integral Suppress Sub-Gun
Factory New HK MP5 (3)-30 Round Magazines
Factory New (500) Rounds Federal XML9N1
Factory New Condor Tactical Range bag

Avguns.com is The Largest KAC, KRISS-USA, POF-USA & LWRC Factory Authorized Class III Dealer and Stocking Warehouse Distributor in the Nation! Our Quality Customer Service doesn't end there. We are the only POF-USA / LWRC Authorized and Sponsored CUSTOM SHOP. What that means to you is that you get the best service, at the BEST PRICE! That also means that we carry a Large Selection of Accessories and provide many Custom Services for your one stop shopping!

Custom Accessories and Services:

Leupold Mark 4 Tactical Scopes
A.R.M.S. Inc Mounting Solutions
Advance Armament Supressors
Troy Industries B.U.I.S. Sights
Silencerco Suppressors
Gemtech Suppressors
MagPul Accessories
GG&G Accessories
Vltor Accessories
AimPoint Optics
EoTech Optics
Trijicon Optics

Avguns.com is The Largest POF-USA & LWRC Factory Authorized CLASS III Dealer and Stocking Warehouse Distributor in the Nation! Our Quality Customer Service doesn't end there. We are the only POF-USA & LWRC Authorized and Sponsored CUSTOM SHOP. What that means to you is that you get the best service, at the BEST PRICE! That also means that we carry a Large Selection of Accessories and provide many Custom Services for your one stop shopping!

Custom Accessories and Services:

Class III Dealer Since 1985 | NRA Benefactor
PO Box 566300 • Miami, FL 33256-6300 • (305) 271-3436 • (866) 415-7066 Fax •
ruben@dealernfa.com
Call Toll Free **866-NFA-WANT (866-632-9268)**, 7 Days a Week, 7am to 9pm
(Eastern)

≡ MENU

Shop

[Home](#) › [Shop](#) › [Machine Guns](#) › [All Transferable Machine Guns](#) › MP5SD-A3,
S&H Arms Sear & Suppressor, 4 Position Pack, Dyer, Excellent #1716, 1716S
& 8671



⊕ Hover to zoom

1716 1716S 8671
© DealerNFA Inc.



MP5SD-A3, S&H Arms Sear & Suppressor, 4 Position Pack, Dyer, Excellent #1716, 1716S & 8671

\$43,995.00

Categories: [All Transferable Machine Guns](#), [H&K](#), [Machine Guns](#) Tags: [hk](#), [mp5](#)
HK MP5K-PDW, SBR, HK Qualified Machine Gun Auto Sear Installed in an SEF Trigger Pack in an MP5K-PDW Upgraded and Registered as an SBR by Mr. Terry Dyer

1716, 1716S & 8671

Gun is in Excellent Condition SEF Trigger Group, Barrel 3-Lug Adapter,



Search entire store here...

GO



[HOME](#) [TERMS OF SERVICE](#)

[FFL REQUEST](#)

[APPRAISAL](#)

[CONTACT US](#)

» We buy Military Collectibles

[Home](#) > [SOLD - H&K MP5 SD - Full Auto](#)

SOLD - H&K MP5 SD - Full Auto



Double click on above image to view full picture

[VIEW MORE](#)



SOLD - H&K MP5 SD - Full Auto

Free Shipping : N/A

Condition : Minty

Bore : 8/10

Caliber : 9mm

Maker : H&K

Type : MP5

**Out of
stock**

☒ [Email to a Friend](#)

\$16,500.00

sku: 317518 - 05811

[Add to Wish List](#)

Details

9/15/17 - This is an original W. Germany production H&K MP5 SD machine gun. The firearm is a pre-sample and can only be transferred dealer-to-dealer. The bore is in great condition, but there is some residue and signs of use, especially within the suppressor. The gun is all original and mechanically sound, with a suppressor made by Urbach Precision Mfg. Co. Comes with two 30 rounds 9mm magazines. Please see photos, and feel free to ask any questions!

Prev Next



MachinegunCentral.com

+Enlarge

HK MP5SD TRANSFERABLE SEAR GUN

TRANSFERABLE!

End Date: 04-14-2018
12:51:11

Price: \$ \$39,000.00
State Tax: 0%

[MAKE OFFER](#)

[Add to Watch List](#)

Item #: 2806

[Seller Information](#)



BTMN963

(nbr items listed) 3

[Follow Seller](#)

[Contact Seller](#)

**[View Sellers Other
Items](#)**

**ATF
Form:** FORM 4

Shipping Buyer responsible for pick-up or shipping
Estim. Shipping Cost: \$ 30.00, Item Location: Texas
(Ships To US only)

Payments: Payment arrangements will be agreed between Buyer and
Seller.

DESCRIPTION:

Prev Next



+Enlarge

HK MP5SD

50 50 Deal Incoming!

End Date: 03-31-2018
04:03:57

Price: \$ \$42,000.00
State Tax: 5.45%

MAKE OFFER

Add to Watch List

Item #: 2137

Seller Information



MWTINC
(nbr items listed) 78

Follow Seller

Contact Seller

**View Sellers Other
Items**

**ATF
Form:** FORM 4

Shipping Buyer responsible for pick-up or shipping
Estim. Shipping Cost: \$ 290, Item Location: Missouri
(Ships To US only)

Payments: Payment arrangements will be agreed between Buyer and
Seller.

DESCRIPTION:



NEW SUBGUNS Is HERE!

[Subguns.com Message Boards](#) | [Subguns.com Classifieds FAQ and Help Page](#)

[Home](#) > [Subguns.com Classified Ads](#) > [NFA Firearms](#) > [All Items in this Category](#)

[Search Ads](#) [Place Ads](#) [Edit Ads](#) [My Profile](#) [Auto Notify](#) [Help](#)

Search for in [NFA Firearms](#)

Within [NFA Firearms](#): [Browse Ads](#) - [Advanced Search](#)

We found **1** matching ad. Now displaying the final ad.

FOR SALE: HK MP5SD



E-mail this ad
to a friend!

[Modify This Ad](#)

[Delete This Ad](#)

[Alert Admin](#)

Expires On: 04/07/2018

Ad Information

Ad Number: 29945
Date Posted: 01/07/2018
Price: \$40,000

Text of Ad

purchased from s&h in 1992, including the s&h sear. shot about once a year during the last 20 years. just refinished by terry dyer due to finish wear on scope mount points. includes 4 position lower, retractable and fixed stocks, 6-30 rd. mags, 1-short mag., and converted suomi drum with pouch. on a form 4. this is a three tax stamp gun. buyer pays first taxes and \$75 shipping. photos on request.

Contact Information

Name: darwin edwards
Street Address:
City:
State/Province: Kentucky
Zip/Postal Code:
Country: usa
Telephone Number: 502-426-1580
E-Mail Address: darwinkedwards@yahoo.com
Web Site URL:

[View NFA Firearms ads posted by this user](#)

[View All ads posted by this user](#)

[New Search](#)

[<< Go Back](#)

[Search Ads](#) [Place Ads](#) [Edit Ads](#) [My Profile](#) [Auto Notify](#) [Help](#)

Change Section

www.subguns.com

[Join Our Affiliate Program](#)

[Terms of Use](#) | [Privacy Statement](#) | [Tell Your Friends](#)

Subguns.com PO Box 330 Alba MO 64830 USA

Content copyright © 2007-2016 Subguns.com. All rights reserved.